

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

KEHINDE BALOGUN,

Plaintiff,

Case No. 18-CV-301

v.

THE BOARD OF REGENTS OF THE
UNIVERSITY OF WISCONSIN SYSTEM,
KEVIN CHEREK and BOBBY BURROW,

Defendants.

PLAINTIFF'S SECOND MOTION IN LIMINE

COMES NOW the Plaintiff by his attorneys Davey & Goldman by Bruce M. Davey and Lisa C. Goldman and moves the court to prevent hearsay testimony by Wayne Bradley and any other witness that “we would get complaints about Tony all the time. I’d go out in the field and they would say ‘Thank God they did not send Tony’” and that “almost every time a computer was delivered by him, it wasn’t delivered correctly. We’d get many calls saying ‘Hey this wasn’t installed on my computer’, ‘hey this piece of software isn’t working like it did on my old computer.’” (Bradley Depos. pp. 24:13 – 25:20; see also 94:21- 95:4, and 101:2 – 18)

The court should also preclude Bradley from testifying that he didn’t deserve to be written up and that all his customers loved him. (Bradley p. 27:3 – 16)

Bradley’s opinions are based on hearsay which is not admissible and therefore should be excluded in evidence.

DATED: July 22, 2019

/s/ Bruce M. Davey

Bruce M. Davey
SBN: 1012256
5609 Medical Circle, Suite 101
Madison, Wisconsin 53719
Telephone: (608) 630-9700
Facsimile: (608) 205-5645

CERTIFICATE OF SERVICE

I hereby certify that on Monday, July 22, 2019, I electronically filed the document above with the Clerk of the Court using the ECF system which will send notification of this filing to the defendants' counsel of record who is a registered user on this case.

DATED: July 22, 2019

DAVEY & GOLDMAN

/s/ Lisa C. Goldman
Lisa C. Goldman, SBN 1029893
Davey & Goldman
5609 Medical Circle, Suite 101
Madison, WI 53719
(608) 630-9700 (telephone)
(608) 205-5645 (facsimile)
lgoldman@daveygoldman.com

Attorneys for Plaintiff